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17 *Attorneys for Plaintiff*

18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 ELIZABETH CANNON, an Individual

21 Plaintiff,

22 vs.

23 ANDERSON BUSINESS ADVISORS LLC,  
24 a Nevada Corporation,

25  
26  
27 Defendants.  
28

**CASE NO.: 2:18-cv-01599-APG-VCF**

**STIPULATION AND ORDER  
EXTENDING TIME TO RESPOND TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

1 The parties, by and through counsel of record, hereby stipulate and agree that Plaintiff  
2 will be granted an extension until **June 26, 2020** to file and serve a response to Defendant's  
3 Motion for Summary Judgment [ECF 111]. The Motion was filed on May 29, 2020 and  
4 Plaintiff's response is due on June 19, 2020.

5  
6 On June 18, 2020, Ms. Marta D. Kurshumova contacted Defendant's counsel requesting  
7 a one-week extension. Ms. Kurshumova informed them that Mr. Philip Trenchak was handling  
8 the opposition, however, a member of his office tested positive for Covid-19 and the office had  
9 to close down. Mr. Kurshumova further informed them that Ms. Foley is away and out of cell  
10 service until Monday, June 22, 2020 and will not be able to work on the opposition until then.  
11 Ms. Christina M. Mamer graciously agreed to the extension.

12  
13 Thus, this request is made in good faith and not for the purpose of delay.

14 Dated: June 19, 2020

MESSNER REEVES LLP

15  
16 By: /s/ Christina Mamer  
CHRISTINA MAE MAMER  
17 RENEE M FINCH  
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20 *Attorneys for Defendant*

21 PRINCE LAW GROUP

22  
23 **IT IS SO ORDERED.**

24 By: /s/ Dennis Prince  
DENNIS MICHAEL PRINCE  
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*Attorney for Defendant*

27   
28 United States District Judge  
Dated: June 22, 2020.

1 Dated: June 19, 2020

HKM EMPLOYMENT ATTORNEYS LLP

2  
3 By: /s/ Jenny Foley  
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9 By: /s/ Philip Trenchak  
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Las Vegas, NV 89104  
12 *Attorneys for Plaintiff*

13  
14 **ORDER**

15  
16 **IT IS SO ORDERED.**

17  
18 \_\_\_\_\_  
DISTRICT COURT JUDGE

19  
20 Dated: \_\_\_\_\_